

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.: 22-cv-61029-RAR

LATOYA RATLIEFF,

Plaintiff,

vs.

CITY OF FORT LAUDERDALE, FLORIDA, a
Municipal Government; ELIEZER RAMOS,
individually; STEVE SMITH, individually; HERNS
EUGENE, individually; PAUL CRISTAFARO,
individually; STEVE GREENLAW, individually;
AVERY FIGUERAS, individually; JOHN DOE 1,
individually; JOHN DOE 2, individually; and JOHN
DOE 3, individually,

Defendants.

DEFENDANT RAMOS'S NOTICE OF SUPPLEMENTAL AUTHORITY

Defendant Eliezer Ramos ("Ramos"), by and through his undersigned attorneys and pursuant to Local Rule 7.8 submits his Notice of Supplemental Authority with respect to Defendant Ramos's Motion to Dismiss First Amended Complaint [ECF 50], and states as follows:

1. Defendant Ramos cites as supplemental authority the May 15, 2023 Order on Motions for Summary Judgment entered by United States District Judge Jose E. Martinez in *Yolanda Woods, Plaintiff v. Christopher Reeve, et al, Defendants*, Case No. 21-14001-CIV-MARTINEZ/MAYNARD in the United States District Court for the Southern District of Florida. The case can be found at 2023 WL 3454922.

2. The *Woods v. Reeve* decision is cited as persuasive supplemental authority for Defendant Ramos's motion to dismiss Count IV of the First Amended Complaint as more fully set forth in ECF 50 at pages 7-9.

Dated: June 1, 2023

Respectfully submitted,

/s/Michael T. Burke

Michael T. Burke, Esquire (338771)

Scott D. Alexander, Esquire (57207)

Burke@jambg.com

Cardona@jambg.com

Alexander@jambg.com

Cintron@jambg.com

Johnson, Anselmo, Murdoch,

Burke, Piper & Hochman, P.A.

2455 East Sunrise Blvd., Suite 1000

Fort Lauderdale, Florida 33304

Telephone: 954-463-0100

Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of June, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of records or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

JOHNSON, ANSELMO, MURDOCH, BURKE,
PIPER & HOCHMAN, P.A.
Counsel for Defendant
2455 East Sunrise Boulevard, Ste. 1000
Fort Lauderdale, FL 33304
Telephone: 954-463-0100

BY: /s/Michael T. Burke

MICHAEL T. BURKE
Florida Bar No. 338771

SERVICE LIST

Stuart N. Ratzan, Esq.
Stuart J. Weissman, Esq.
Kimberly L. Boldt, Esq.
Ratzan Weissman & Boldt
2850 Tigertail Avenue, Suite 400
Coconut Grove, FL 33133
Tele: 305.374.6366
Stuart@rwblawyers.com
StuartW@rwblawyers.com
Kimberly@rwblawyers.com
kathy@rwblawyers.com
Jessica@RWBlawyers.com
eservice.legal@rwblawyers.com

Benedict P. Kuehne
Michael T. Davis
Johan D. Dos Santos
Kuehne Davis Law, P.A.
100 SE 2 Street, Suite 3105
Miami, FL 33131
Tel: 305.789.5989
ben.kuehne@kuehnelaw.com
mdavis@kuehnelaw.com
johand@kuehnelaw.com
efiling@kuehnelaw.com
iaedo@kuehnelaw.com

Jeffery R. Lawley, Esq.
Fla. Bar No. 0596027
Billing, Cochran, Lyles et al
Las Olas Square
515 E. Las Olas Blvd., 6th Floor
Fort Lauderdale, Florida 33301
Phone: 954-764-7150
jrl@bclmr.com
maryannt@bclmr.com

Michael T. Burke, Esq.
Scott D. Alexander, Esq.
Johnson, Anselmo, Murdoch, Burke,
Piper & Hochman, P.A.
2455 East Sunrise Boulevard, Ste. 1000
Ft. Lauderdale, FL 33304
Tel: 954-463-0100
Burke@jambg.com
Cardona@jambg.com
Alexander@jambg.com
Cintron@jambg.com